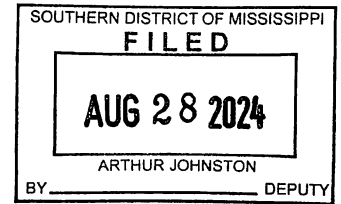


IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
SOUTHERN DIVISION



UNITED STATES OF AMERICA

v.

TYLER SURLA

SUPERSEDING INDICTMENT

CRIMINAL NO. 1:24-cr-00083-TBM-BWR

18 U.S.C. § 2252(a)(4)(B) and (b)(2)

18 U.S.C. § 2251(a) and (e)

The Grand Jury charges:

COUNT 1

On or about July 1, 2023, in Hancock County, in the Southern Division of the Southern District of Mississippi, and elsewhere, the defendant, **TYLER SURLA**, did knowingly possess at least one matter that contained any visual depiction, using any means or facility of interstate or foreign commerce or that had been mailed, shipped, or transported in interstate or foreign commerce, or which was produced using materials that had been so mailed, shipped, or transported, the production of which involved one or more minors engaging in sexually explicit conduct and the depiction was of such conduct, specifically: the defendant received Snapchat messages on a device, containing one or more file images, in digital still or video format, that contained visual depictions, the production of which involved the use of a minor engaged in sexually explicit conduct, and was of such conduct, as defined in Title 18, United States Code, Section 2256, and that had traveled in interstate commerce.

All in violation of Title 18, United States Code, Sections 2252(a)(4)(B) and (b)(2).

COUNT 2

On or about July 26, 2023, in Hancock County, in the Southern Division of the Southern District of Mississippi, and elsewhere, the defendant, **TYLER SURLA**, did knowingly possess at least one matter that contained any visual depiction, using any means or facility of interstate or foreign commerce or that had been mailed, shipped, or transported in interstate or foreign commerce, or which was produced using materials that had been so mailed, shipped, or

transported, the production of which involved one or more minors engaging in sexually explicit conduct and the depiction was of such conduct, specifically: the defendant received Snapchat messages on a device, containing one or more file images, in digital still or video format, that contained visual depictions, the production of which involved the use of a minor engaged in sexually explicit conduct, and was of such conduct, as defined in Title 18, United States Code, Section 2256, and that had traveled in interstate commerce.

All in violation of Title 18, United States Code, Sections 2252(a)(4)(B) and (b)(2).

COUNT 3

On or about October 12, 2023, in Hancock County, in the Southern Division of the Southern District of Mississippi, and elsewhere, the defendant, **TYLER SURLA**, did knowingly possess at least one matter that contained any visual depiction, using any means or facility of interstate or foreign commerce or that had been mailed, shipped, or transported in interstate or foreign commerce, or which was produced using materials that had been so mailed, shipped, or transported, the production of which involved one or more minors engaging in sexually explicit conduct and the depiction was of such conduct, specifically: the defendant received Snapchat messages on a device, containing one or more file images, in digital still or video format, that contained visual depictions, the production of which involved the use of a minor engaged in sexually explicit conduct, and was of such conduct, as defined in Title 18, United States Code, Section 2256, and that had traveled in interstate commerce.

All in violation of Title 18, United States Code, Sections 2252(a)(4)(B) and (b)(2).

COUNT 4

On or about March 1, 2024, in Hancock County, in the Southern Division of the Southern District of Mississippi, and elsewhere, the defendant, **TYLER SURLA**, employed, used, persuaded, induced, enticed, or coerced Minor Victim #1, to engage in sexually explicit conduct, for the purpose of producing one or more visual depictions of such conduct, and such visual

depictions were produced using materials that had been mailed, shipped, or transported in or affecting interstate and foreign commerce by any means, including by computer.

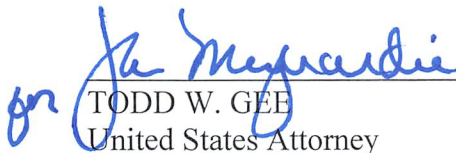
All in violation of Title 18, United States Code, Section 2251(a) and (e).

NOTICE OF INTENT TO SEEK CRIMINAL FORFEITURE

As a result of committing the offenses as alleged in this Indictment, the defendant shall forfeit to the United States all property involved in or traceable to property involved in the offenses, including but not limited to all proceeds obtained directly or indirectly from the offenses, and all property used to facilitate the offenses.

Further, if any property described above, as a result of any act or omission of the defendant: (a) cannot be located upon the exercise of due diligence; (b) has been transferred or sold to, or deposited with, a third party; (c) has been placed beyond the jurisdiction of the Court; (d) has been substantially diminished in value; or (e) has been commingled with other property, which cannot be divided without difficulty, then it is the intent of the United States to seek a judgment of forfeiture of any other property of the defendant, up to the value of the property described in this notice or any bill of particulars supporting it.

All pursuant to Title 18, United States Code, Sections 2253(a)(2) and (a)(3).


TODD W. GEE
United States Attorney

A TRUE BILL:

s/signature redacted
Foreperson of the Grand Jury

This indictment was returned in open court by the foreperson or deputy foreperson of the Grand Jury on this the 28th day of August 2024.


UNITED STATES MAGISTRATE JUDGE